

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

R’KES STARLING, individually and behalf of  
all others similarly situated,

Plaintiff,

v.

PR ADVISORS, LLC, D/B/A PINNACLE  
REALTY ADVISORS and RAM  
PROPERTIES, LLC,

Defendants.

Case No. 1:24-cv-00991-DII

**DEFENDANT PR ADVISORS, LLC’S UNOPPOSED MOTION FOR AN EXTENSION  
OF TIME TO ANSWER, MOVE OR OTHERWISE RESPOND TO COMPLAINT**

Defendant PR Advisors, LLC, d/b/a Pinnacle Realty Advisors (“Defendant”), by and through its undersigned counsel, respectfully submits this **unopposed** motion for an extension of time to answer, move, or otherwise respond to Plaintiff’s Complaint (*see* Dkt. 1, “Complaint”) in the above-referenced matter **to and including November 26, 2024**, and states as follows:

1. Plaintiff filed his Complaint in this matter on August 26, 2024. *See* Dkt. 1.
2. Defendant waived service of process on September 13, 2024, making its initial responsive pleading deadline November 12, 2024, which is the *current* deadline. *See* Dkt. 4.
3. There are several reasons as to why Defendant and its counsel seek and are in need of an extension of time as to Defendant’s aforementioned pleading deadline. First, Defendant and its counsel need sufficient time to adequately investigate the underlying facts and allegations in the Complaint, prepare an appropriate responsive pleading(s), and potentially explore an extra-judicial resolution with Plaintiff, which may obviate the need to respond to the Complaint altogether if successful. Second, Defendant’s counsel have several unmovable professional and personal scheduling conflicts with the current deadline, which make completing the foregoing

tasks by the current deadline extraordinarily difficult. Third, though it denies liability, Defendant desires to explore an extra-judicial resolution of this dispute with Plaintiff without incurring additional legal expenses or burdening the Court or its resources, and therefore requires additional time prior to the deadline to do so. Fourth, an extension will promote efficiency and conserve judicial and party resources, by allowing Defendant sufficient time to investigate the claims and attempt to reach an extra-judicial resolution without having to engage in motion practice.

4. Given the foregoing, Defendant seeks a modest 14-day extension of time, to and including November 26, 2024, to answer, move, or otherwise respond to the Complaint.

5. Defendant has not previously requested an extension in this matter.

6. On November 16, 2024, counsel for Defendant conferred with counsel for Plaintiff, Andrew Perrong, regarding this Motion prior to its filing, who confirmed in writing the same day that Plaintiff agrees to, has no objection to, and does not oppose the requested extension.

7. Good cause exists for granting Defendant's request for at least the reasons above, and because the requested extension will promote efficiency and judicial and party economy.

8. Since this matter was just recently filed and is in its early stages, Plaintiff is in agreement, and there are no other parties to this case, the requested extension will not result in any prejudice nor impact the timely resolution of this case.

9. The foregoing request is not being made for the purpose of delay, is being made for the purpose of judicial and party economy, and will not prejudice any party to this action.

10. In seeking this extension, Defendant does not concede that it has been properly named in this action, and Defendant does not waive and expressly reserves all defenses relating to the Complaint, including jurisdictional defenses or the right to move to compel arbitration, if and when it is determined there is an applicable arbitration agreement between the parties.

11. A proposed order has been provided herewith for the Court's consideration.

WHEREFORE, Defendant respectfully requests this Court enter the proposed order, or a substantially similar order, (i) granting Defendant an extension of time to answer or otherwise respond to the Complaint in this action **to and including November 26, 2024**; and (ii) granting all other relief the Court deems just and proper.

Dated: November 7, 2024

Respectfully submitted,

By: /s/ Leoncio A. Gil, III

**C. BRENTON KUGLER**

Texas State Bar No. 11756250

[brent.kugler@solidcounsel.com](mailto:brent.kugler@solidcounsel.com)

SCHEEF & STONE, L.L.P.

500 North Akard, Suite 2700

Dallas, Texas 75201

(214) 706-4200 - Telephone

(214) 706-4242 – Facsimile

and

**LEONCIO A. GIL, III**

Texas State Bar No. 24094204

[leon.gil@solidcounsel.com](mailto:leon.gil@solidcounsel.com)

SCHEEF & STONE, L.L.P.

2600 Network Blvd., Suite 400

Frisco, Texas 75034

(214) 472-2100 – Telephone

(214) 472-2150 – Facsimile

and

**JOHN W. MCGUINNESS**

[jmcguinness@manatt.com](mailto:jmcguinness@manatt.com)

(*Pro Hac Vice* to be requested)

**A. PAUL HEERINGA**

[pheeringa@manatt.com](mailto:pheeringa@manatt.com)

(*Pro Hac Vice* to be requested)

MANATT, PHELPS & PHILLIPS, LLP

1050 Connecticut Avenue, NW, Suite 600

Washington, D.C. 20036

Telephone: 202-585-6500  
Facsimile: 202-585-6600

**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I certify that on, November 7, 2024, a true and correct copy of the foregoing document was electronically filed with the Court's ECF system to be sent via the electronic notification system to all counsel of record in the above-captioned matter.

By: /s/ Leoncio A. Gil, III  
**LEONCIO A. GIL, III**